

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

UNITED STATES OF AMERICA, §  
§  
Plaintiff, § § Cause No.: EP-11-CR-02728-KC  
v. §  
§  
ANGEL OCASIO, §  
§  
Defendant. §

**GOVERNMENT'S POSITION IN SUPPORT OF  
TLO, LLC'S MOTION TO QUASH**

COMES NOW the United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and files this Amicus Brief in Support of TLO's Motion to Quash and would show unto this Honorable Court the following:

On May 30, 2013, TLO, LLC moved to quash subpoenas served upon an employee and representative of that company. [ECF Doc. 141]. The Government hereby supports said motion and, to the extent the Government may have standing, joins in the Motion for the reasons set forth in the TLO, LLC brief. The Government's interest in this matter is apparent in that the subpoenas seek law enforcement sensitive material and fear the loss of this proprietary tool would be devastating to law enforcement and future child victims.

WHEREFORE, the Government submits TLO, LLC's Motion is well-taken for the reasons set forth therein and, therefore, should be granted.

Respectfully submitted,

ROBERT PITMAN  
UNITED STATES ATTORNEY

By: /s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of June, 2013, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participant:

Michael F. Gorman, AFDP  
Shane McMahon, AFDP

as attorneys for defendant, and to:

Christopher Antcliff, Esq.

as attorney for third-party movant, TLO, LLC.

/s/  
J. BRANDY GARDES  
Assistant U.S. Attorney